

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK  
BROOKLYN DIVISION

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IN RE

TAGOR JAFFREY CHOWDHURI AKA  
TAGOR J CHOWDHURI AKA TAGOR  
CHOWDHURI AKA TAGOR CHOUDHURI  
AKA MOHAMMAD TAGOR

CHAPTER 13

CASE NO. 18-41875

JUDGE: Elizabeth S. Stong

DEBTOR

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**OBJECTION TO CONFIRMATION**

Alexandros E. Tsionis, Esq., an attorney admitted to practice in this Court, affirms the following under penalty of perjury:

1. I am an associate with Shapiro, DiCaro & Barak, LLC, attorney for Nationstar Mortgage LLC as Servicer for Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QH1, and am familiar with the facts and circumstances surrounding this matter.

2. Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QH1, holds a mortgage on the Debtor's real property known as 87-49 257th Street, Floral Park, NY 11001 (the "Property").

3. Nationstar Mortgage LLC d/b/a Mr. Cooper has filed a Proof of Claim for pre-petition mortgage arrears in the amount of \$147,058.73. Debtor's proposed Chapter 13 Plan makes no provision for full payment of the mortgage arrears in violation of Bankruptcy Code Section 1325(a)(5)(B)(ii). Debtor's proposed Chapter 13 plan does request participation in Loss Mitigation. However the outcome of same is inherently uncertain and as such, said Plan fails to

address the possibility of the failure of obtaining a mortgage modification or obtaining one with different terms than those suggested in the Plan.

4. Further, the plan does not provide for the making of the regular monthly note and mortgage payments by Debtor as required by 11 U.S.C. § 1322 (b)(5).

**WHEREFORE**, the undersigned respectfully requests the Debtor to amend their Chapter 13 Plan to reflect the proper mortgage arrears as specified earlier or, in the absence of an amendment to the Plan, the undersigned respectfully requests an Order of this Court denying confirmation of Debtor's Chapter 13 Plan pursuant to Bankruptcy Code Section 1325 and such other and further relief as may be just and proper.

Dated: May 22, 2018

Respectfully submitted,

/s/ Alexandros Tsionis

Alexandros E. Tsionis

Bankruptcy Attorney

Shapiro, DiCaro & Barak, LLC

Attorneys for Nationstar Mortgage LLC as Servicer  
for Deutsche Bank Trust Company Americas, as  
Trustee for Residential Accredited Loans, Inc.,  
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Series 2006-QH1

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